

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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JANET KRONEMBERG,	:	
	:	
Plaintiff,	:	Civil Case No.:
-against-	:	15-cv-3235(LDW)(AYS)
	:	
WINTHROP UNIVERSITY HOSPITAL,	:	<u>NOTICE OF MOTION</u>
PATRICE VILLA, in her official and individual	:	
capacity, ENRICO PEREZ, in his official and	:	
individual capacity,	:	
	:	
Defendants.	:	
	:	
	:	

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PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated October 18, 2016, the Declaration of Mary Ellen Donnelly, dated October 18, 2016, and all of the Exhibits submitted herewith, Defendants, Winthrop University Hospital, Patrice Villa and Enrico Perez, will move this Court before the Honorable Leonard D. Wexler, United States District Judge for the United States District Court for the Eastern District of New York, United States District Court, 944 Federal Plaza, Central Islip, New York 11722, at a date and time to be designated by the Court, for an order, pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing the Amended Complaint in its entirety with prejudice, and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, are to be served upon the undersigned on or before a date to be agreed upon by the parties.

Dated: New York, New York
October 18, 2016

PUTNEY, TWOMBLY, HALL & HIRSON LLP

By: /s/ RMT

Mary Ellen Donnelly
Robert M. Tucker
521 Fifth Avenue
New York, New York 10175
(212) 682-0020

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned, a member of the Bar of this Court, hereby certifies that he personally served a true and accurate copy of a Notice of Motion, Declaration of Mary Ellen Donnelly, with exhibits, and a Memorandum of Law in Support of Defendants' motion to dismiss, via regular mail upon:

Frederick K. Brewington, Esq.
The Law Offices of Frederick K. Brewington
556 Peninsula Boulevard
Hempstead, New York 11550

Attorneys for Plaintiff

/s/ RMT
Robert M. Tucker